

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION**

THE SOUTH CAROLINA STATE  
CONFERENCE OF THE NAACP,

and

TAIWAN SCOTT, on behalf of himself and all  
other similarly situated persons,

*Plaintiffs,*

v.

HENRY D. MCMASTER, in his official  
capacity as Governor of South Carolina;  
HARVEY PEELER, in his official capacity as  
President of the Senate; LUKE A. RANKIN, in  
his official capacity as Chairman of the Senate  
Judiciary Committee; JAMES H. LUCAS, in  
his official capacity as Speaker of the House of  
Representatives; CHRIS MURPHY, in his  
official capacity as Chairman of the House of  
Representatives Judiciary Committee;  
WALLACE H. JORDAN, in his official  
capacity as Chairman of the House of  
Representatives Elections Law Subcommittee;  
HOWARD KNABB, in his official capacity as  
interim Executive Director of the South  
Carolina State Election Commission; JOHN  
WELLS, JOANNE DAY, CLIFFORD J.  
ELDER, LINDA MCCALL, and SCOTT  
MOSELEY, in their official capacities as  
members of the South Carolina State Election  
Commission,

*Defendants.*

Civil Action No.: 3:21-cv-03302-JMC

**GOVERNOR MCMASTER’S  
RESPONSES TO LOCAL CIVIL RULE  
26.01 (D.S.C.) INTERROGATORIES**

**COMES NOW** Defendant Henry D. McMaster, in his official capacity as Governor of  
South Carolina (“Governor McMaster” or “Governor”), by and through the undersigned counsel,

and responds to the Interrogatories required by Rule 26.01 of the Local Civil Rules (D.S.C.) as follows:

(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

**RESPONSE: At this time, Governor McMaster is not aware of any persons or legal entities that may have a subrogation interest in connection with this matter.**

(B) As to each claim, state whether it should be tried jury or nonjury and why.

**RESPONSE: All of the claims alleged in the Complaint should be tried nonjury, because Plaintiffs seek only declaratory, injunctive, or other purported equitable relief and because Plaintiffs have not demanded a jury trial on any claim so triable.**

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

**RESPONSE: Not applicable.**

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

**RESPONSE: This action was filed by Plaintiffs in the Columbia Division of the United States District Court for the District of South Carolina. If or to the extent that this Court has jurisdiction over one or more of Plaintiffs' claims, Governor McMaster does not presently object to or challenge the appropriateness of this division pursuant to Rule 3.01 of the Local Civil Rules (D.S.C.).**

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that may be related regardless of whether they

are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the clerk of court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

**RESPONSE: At this time, Governor McMaster is not aware of any related actions filed in the United States District Court for the District of South Carolina.**

(F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

**RESPONSE: Governor McMaster is being sued in his official capacity and is properly identified.**

(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

**RESPONSE: At this time, Governor McMaster does not contend that some other person or legal entity is liable to him or to Plaintiffs as it relates to this matter.**

[SIGNATURE ON FOLLOWING PAGE]

Respectfully submitted,

s/Thomas A. Limehouse, Jr.

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October 20, 2021

Columbia, South Carolina